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MEMO ENDORSED

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August 16, 2022

VIA ECF

Hon. Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

SO ORDERED
Lewis A. Kaplan
Granted.
1/1 JTC
8/17/22
LEWIS A. KAPLAN, USDJ

Re: *Moonbug Entertainment Limited, et al. v. Changsha Dahuan Electronic Technology Co., Ltd., et al.*
Case No. 22-cv-5040 (LAK)
Request for Extension of Time to File Motion for Default Judgment

Dear Judge Kaplan,

We represent Plaintiffs Moonbug Entertainment Limited and Treasure Studio Inc. ("Plaintiffs") in the above-referenced action.¹ At the Show Cause Hearing on July 19, 2022, the Court directed Plaintiffs to file a Motion for Default Judgment in this action by no later than August 18, 2022. Plaintiffs respectfully request a short extension of time to file their Motion for Default Judgment, until September 8, 2022 because Plaintiffs are engaging in productive settlement discussions with several Defendants. While none of the Defendants have indicated any intention to formally appear in this action, Plaintiffs respectfully request that the Court allow Plaintiffs additional time to reach amicable resolutions with these Defendants prior to moving for Default Judgment.

In accordance with Your Honor's Individual Rules and Practices, Plaintiffs respectfully submit the following:

- i. **The number of previous requests for adjournment or extension:** None, this is Plaintiffs' first request for an extension of time to file their Motion for Default Judgment
- ii. **Disposition of previous requests:** N/A
- iii. **Whether opposing counsel consents to extension:** None of the Defendants remaining in this action have filed Answers or otherwise formally appeared, and are all currently in default, thus Plaintiffs did not seek their consent.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary.